IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA)
) Criminal No. 1:18-cr-00083-TSE
V.	Judge T. S. Ellis, III
PAUL J. MANAFORT, JR.,) Trial Date: July 25, 2018
Defendant.)))

<u>DEFENDANT PAUL J. MANAFORT JR.'S RESPONSE TO THE</u> COURT'S JULY 10, 2018 ORDER RELATING TO HIS PLACE OF DETENTION

Defendant Paul J. Manafort, Jr., by and through counsel, files this response to the Court's July 10, 2018 Order relating to his place of detention. (Dkt. 113). Earlier today, the Court issued an order addressing some of the concerns raised by Mr. Manafort in his motion to continue the trial. (Dkt. 109). In that motion, one issue Mr. Manafort raised was the effect of his detention on the pace of trial preparation.

The Court endeavored to address some of those concerns in its July 10, 2018 Order by having Mr. Manafort relocated to the Alexandria Detention Center. However, the concerns underlying the request for a continuance, while specifically noting the substantial distance between Northern Neck Regional Jail and Alexandria, were, at bottom, aimed more at the difficulty of preparing for trial given Mr. Manafort's detention versus his prior status on pretrial release.

In light of Mr. Manafort's continuing detention and after further reflection, issues of distance and inconvenience must yield to concerns about his safety and, more importantly, the

challenges he will face in adjusting to a new place of confinement and the changing circumstances of detention two weeks before trial. With these considerations in mind, Mr. Manafort respectfully asks the Court to permit him to remain in his current place of detention.

WHEREFORE, Mr. Manafort respectfully requests that the Court rescind its order directing that he be moved and permit him to remain at the Northern Neck Regional Jail.

Dated: July 10, 2018 Respectfully submitted,

s/ Kevin M. Downing
Kevin M. Downing (pro hac vice)
Law Office of Kevin M. Downing
601 New Jersey Avenue NW
Suite 620
Washington, DC 20001
(202) 754-1992
kevindowning@kdowninglaw.com

s/ Thomas E. Zehnle
Thomas E. Zehnle (VSB No. 27755)
Law Office of Thomas E. Zehnle
601 New Jersey Avenue NW
Suite 620
Washington, DC 20001
(202) 368-4668
tezehnle@gmail.com

s/ Jay R. Nanavati
Jay R. Nanavati (VSB No. 44391)
Kostelanetz & Fink LLP
601 New Jersey Avenue NW
Suite 620
Washington, DC 20001
(202) 875-8000
jnanavati@kflaw.com

Counsel for Defendant Paul J. Manafort, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of July, 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Andrew A. Weissman Greg D. Andres Uzo Asonye U.S. Department of Justice Special Counsel's Office 950 Pennsylvania Avenue NW Washington, DC 20530 Telephone: (202) 616-0800 Email: AAW@usdoj.gov

> GDA@usdoj.gov UEA@usdoj.gov

> > s/ Jay R. Nanavati
> > Jay R. Nanavati (VSB No. 44391)
> > Kostelanetz & Fink LLP
> > 601 New Jersey Avenue NW
> > Suite 620
> > Washington, DC 20001
> > (202) 875-8000
> > jnanavati@kflaw.com

Counsel for Defendant Paul J. Manafort, Jr.